UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

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BERNIECE A. BURSH,	
Plaintiff,	
v.	5:19-cv-00196-OLG
TRANSUNION LLC,	
Defendant.	

PROPOSED SCHEDULING ORDER

Pursuant to Fed. R. Civ. P 26(f), Local Court Rule CV-16(c), and this Honorable Court's Order and Advisory (Dkt. #14), the parties submit the following Proposed Scheduling Order:

IT IS ORDERED THAT:

- 1. A report on alternative dispute resolution in compliance with Local Rule CV-88 shall be filed on or before **October 23, 2019.**
- 2. Plaintiff shall submit an updated written offer of settlement to Defendant on July 3, 2019, and Defendant shall respond, in writing, on or before July 17, 2019.
- 3. The parties shall file all amended or supplemental pleadings and shall join additional parties on or before **July 24, 2019**.
- 4. All parties asserting claims for relief shall file and serve on all other parties their designation of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all other parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) on or before **September 16, 2019**. Parties resisting claims for relief shall file and serve on all other parties their designations of potential witnesses, testifying experts, and proposed exhibits, and shall serve on all other parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) on or before **September 23, 2019**. All designations of rebuttal experts shall be filed and served on all other parties not later than 14 days of receipt of the report of the opposing expert, and the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) for such rebuttal experts, to the extent not already served, shall be served, but not filed, on all other parties not later than 14 days of receipt of the report of the opposing expert.

- 5. Any objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, not later than 11 days of receipt of the written report of the expert's proposed testimony or not later than 11 days of the expert's deposition, if a deposition is taken, whichever is later.
- 6. The parties shall complete discovery on or before **January 20, 2020**. Counsel may, by agreement, continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.
- 7. The parties shall mediate this case on or before **November 11, 2019**, unless the parties seek an order from the Court excusing them from mediation.
- 8. All dispositive motions shall be filed and served on all other parties on or before **February 20, 2020** and shall be limited to 20 pages.
- 9. This case is set for jury selection and trial on **July 20, 2020** at 9:30 am. The parties should consult Local Rule CV-16(e) regarding matters to be filed in advance of trial.

SIGNED this	day of	, 20	
		HON. ORLANDO L. GARCIA	
		LINITED STATES HIDGE	

AGREED:

s/ Taxiarchis Hatzidimitriadis

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s/ Lauren Wood

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CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Plaintiff, certifies that on June 13, 2019, he caused a copy of the foregoing, PROPOSED SCHEDULING ORDER, to be served via the Court's electronic filing database on all parties of record.

Respectfully submitted,

<u>s/ Taxiarchis Hatzidimitriadis</u>Taxiarchis Hatzidimitriadis, Esq. #6319225*Counsel for Plaintiff*